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6							
7	bjefferis@psalaw.net						
8	Attorneys for Defendant						
	Wal-Mart Stores, Inc.						
9	UNITED STATES	S DISTRICT COURT					
10							
11	DISTRICT	OF NEVADA					
12		Case No.: 2:17-cv-02647-GMN-VCF					
13	SADIYYAH ABDULLAH,	SECOND AMENDED STIPULATION					
14	Plaintiff,	AND ORDER TO EXTEND DISCOVERY DEADLINES					
15	V.						
	WAL-MART STORES INC.; DOES I-X, inclusive, and ROE CORPORATIONS I-X,	[FIRST REQUEST]					
16	inclusive,						
17	Defendants.						
18							
19	DI : .: CC CADWALL ADDINA ALL C						
20	Plaintiff SADIYYAH ABDULLAH (he	ereinafter "Plaintiff") and Defendant WAL-MART					
21	STORES, INC. (hereinafter "WALMART" or "I	Defendant"), by and through their respective counsel					
	of record, do hereby stipulate to extend the remaining deadlines in the current scheduling order and						
22	discovery plan in this matter for a period of sixty (60) days for the reasons explained herein.						
23	Pursuant to Local Rule 6-1(b), the parti	es hereby aver that this is the first such discovery					
24	extension requested in this matter.						
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2 The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 3 26(a) disclosures; 4 Plaintiff has served upon Defendant one sets of Requests for Production, one set of 5 Interrogatories and one set of Requests for Admissions. Defendant is in the process of 6 responding to said Requests. 7 Defendant has served upon Plaintiff one set of Requests for Production, one set of 8 Interrogatories and one set of Requests for Admissions. Plaintiff has submitted timely 9 responses to first written discovery; 10 DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY 11 Discovery to be completed includes: 12 Plaintiff's IME with Defendant's expert physicians; 13 Additional written discovery (if necessary); 14 Depositions of fact witnesses; 15 Depositions of Plaintiff's treating physicians; 16 Depositions of expert witnesses and rebuttal expert witnesses; 17 Defendant's 30(b)(6) witness deposition; 18 Inspection of the subject premises (if necessary). 19 The parties aver, pursuant to Local Rule 6-1, that good cause exists for their requested extension of 20 current discovery because Defendant's 30(b)(6) witness will be taken after January 3, 2017, as Walmart is 21 22 currently in its holiday blackout period. Further, the parties anticipate a greater likelihood that they will 23 be able to negotiate a resolution of this case prior to incurring fees and costs for pre-trial preparation. 24 25 26 27 28

**DISCOVERY COMPLETED TO DATE** 

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1	[PROPOSED] NEW DISCOVERY DEADLINES							
2	Expert Disclosure Deadline .	•	•		•	March 20, 2018		
3	Joint Interim Status Report.	•	•		•	March 20, 2018		
4	Rebuttal Expert Disclosure Deadl	ine	•		•	April 20, 2018		
5	Discovery Cut-Off Date .	•	•		•	May 21, 2018		
6	Dispositive Motion Deadline	•	•	•		June 19, 2018		
7	Proposed Joint Pre-Trial Order	•	•	•		July 17, 2018		
8								
9	If this extension is granted, all anticipated additional discovery should be concluded within the							
10	stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is							
11	made by the parties in good faith and not for the purpose of delay.							
12								
13	DATED this 15 <sup>TH</sup> day of December, 2017.		DATI	ED this	15 <sup>th</sup> day	of December, 2017.		
14	/s/ David M. Menocal		/s/Bet	sy C. J	efferis			
15	DAVID M. MENOCAL, ESQ.		BETSY			ESQ.		
16	Nevada Bar No. 13191 DECASTROVERDE LAW GROUP		Nevada PHILLII			& ANGSTADT LLC		
17	1149 S. Maryland Pkwy Las Vegas, Nevada 89104		504 Sou Las Veg	th Nint	h Street			
18			_					
19	Attorneys for Plaintiff Sadiyyah Abdullah		Attorney Wal-Ma		•	t		
20								
21								
22	IT IS SO ORDERED:		ant	Ł.	he.	Paracon -		
23	If dispositive motions are filed, the		-					
24	deadline for filing the joint pretrial <b>UNIT</b> order will be suspended until 30	ED	STATES	MAG	ISTRAT	TE JUDGE		
25	days after decision on the	ED:	12-18-20	17				
26	dispositive motions or further court order.	·•_				<del></del>		

1	<u>CERTIFICA</u>	ATE OF SERVICE							
2	Pursuant to FRCP Rule 5, I hereby certify that I am an employee of the law firm PHILLIPS,								
3	SPALLAS & ANGSTADT, LLC, and that on this 15 <sup>th</sup> day of December, 2017, I electronically served								
4	a copy of SECOND AMENDED STIPULATION AND ORDER TO EXTEND DISCOVERY								
5	DEADLINES [FIRST REQUEST] as follows:								
6	☐ By facsimile addressed to the following counsel of record, at the address listed below;								
7	☐ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope								
8	upon which first class postage was prepaid in Las Vegas, Nevada;								
9	By Hand Delivery (ROC); and/or								
10									
11	ATTORNEY OF RECORD	TELEPHONE/FAX	PARTY						
12 13	Alex J. De Castroverde Nevada Bar No. 6950 Orlando De Castroverde	Phone 702-383-0606 Fax 702-383-8741	Plaintiff						
14	Nevada Bar No. 7320 DE CASTROVERDE LAW GROUP								
15	1149 S. Maryland Pkwy Las Vegas, NV 89104								
16	/o/ Poton C. Loffon	:							
17	/s/ Betsy C. Jefferis  An Employee of PHILLIPS, SPALLAS & ANGSTADT LLC								
18	All Elliployee of PHILLIPS	S, SPALLAS & ANGSTADT LLC							
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